



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

MAR 15 2015

Carl Rundquist, Pretreatment Coordinator  
Antrim Township  
10655 Antrim Church Road  
P.O. Box 130  
Greencastle, PA 17225

Re: Information Requirement for Antrim Township  
Sewage Treatment Facility Pretreatment Program

Dear Mr. Rundquist,

Enclosed please find an Information Requirement issued this date pursuant to Section 308 of the Clean Water Act, 33 U.S.C. § 1318 that requires, among other things, that Antrim Township provide detailed information regarding compliance with the pretreatment requirements of the Sewer Treatment Facility permit (NPDES Permit # PA0080519). The requirement to provide EPA with the information requested is mandatory, and you must respond in accordance with the instructions and deadlines set forth in the Information Requirement.

Please contact Ms. Lisa Trakis at (215) 814-5433 if you have any questions regarding this Information Requirement.

Sincerely,

A handwritten signature in blue ink, appearing to read "DLB", is written over the typed name of David B. McGuigan.

David B. McGuigan, Associate Director  
Office of NPDES Permits & Enforcement  
Water Protection Division

Enclosures  
cc w/encl.: John Alleman, Chairman  
Board of Supervisors

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

In The Matter of:

Antrim Township  
10655 Antrim Church Road  
P.O. Box 130  
Greencastle, PA 17225

Proceeding under Section 308 of the  
Clean Water Act, 33 U.S.C. § 1318

**INFORMATION REQUIREMENT**

**I. STATUTORY AUTHORITY**

1. This Information Requirement is issued under the authority vested in the United States Environmental Protection Agency (EPA) by Section 308 of the Clean Water Act (CWA or Act), 33 U.S.C. § 1318. The Administrator of the EPA has delegated this authority to the Regional Administrator of EPA Region III who in turn has delegated it to the Director of the Water Protection Division of EPA Region III who in turn has delegated it to the Associate Director of the Office of NPDES Permits and Enforcement. EPA hereby requires that Antrim Township provide detailed information regarding compliance with National Pollutant Discharge Elimination System Permit No. PA0080519.

**II. STATUTORY AND REGULATORY BACKGROUND**

2. EPA is authorized under Section 308 of the CWA , 33 U.S.C. § 1318, to require owners and operators of point sources to establish records and make such reports as may be necessary to carry out the purpose of the Act, including but not limited to:
  - (a) Developing or assisting in the development of any effluent limitation, or other limitation, prohibition, effluent standard, pretreatment standard, or standard of performance under the CWA;
  - (b) Determining whether any person is in violation of any such effluent limitation, or other limitation, prohibition or effluent standard, pretreatment standard, or standard of performance;
  - (c) Any requirement under Section 308 of the CWA; and

(d) Carrying out Sections 305, 311, 402, 404, and 504 of the CWA.

3. Any failure to respond as directed is punishable under the civil and criminal provisions of Section 309 of the Act, which provide for the assessment of penalties, injunctive relief and imprisonment.

You may, if you desire, assert a business confidentiality claim covering all or part of the information requested herein in the manner described in 40 C.F.R. Section 2.203(b). Information covered by such a claim will be disclosed by EPA only to the extent and by means of the procedures set forth in Subpart B, 40 C.F.R. Part 2. If no claim of confidentiality accompanies the information requested herein when it is received by EPA, it may be made available to the public by EPA without further notice. This inquiry is not subject to review by the Office of Management and Budget under the Paperwork Reduction Act, 44 U.S.C. Chapter 35. (See 5 C.F.R. § 1320.3(c)).

### **III. INSTRUCTIONS**

4. Provide a separate narrative response for each question and for each subpart of each question set forth below. Precede each answer with the corresponding number of the question to which it responds.
5. Identify each person responding to any question contained in this Information Requirement on behalf of Antrim Township, as well as each person consulted in the preparation of the response.
6. For each question, identify each document consulted, examined, or referred to in the preparation of the response or that contains information responsive to the question, and provide a true and correct copy of each such document if not provided in response to another specific question.
7. Indicate on each document produced in response to this Information Requirement, or in some other reasonable manner, the number of the question to which it corresponds.
8. If requested information or documents are not known or are not available at the time of your response to this Information Requirement, but later become known or available the Antrim Township must supplement its response to EPA. Moreover, should the Antrim Township find at any time after submission of its response that any portion is or becomes false, incomplete, or misrepresents the facts; the Antrim Township must provide EPA

with a corrected response as soon as possible.

9. Section 308 of the Act, 33 U.S.C. § 1318, requires the Antrim Township Municipal Authority to provide accurate and complete information in response to the questions contained in this request. All submissions provided pursuant to this Section 308 Requirement shall be signed and dated by a responsible official of Antrim Township and must include the following certification:

***"I certify that the information contained in or accompanying this submission is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. I certify as having responsibility for the persons who, acting under my direct instruction, made the verification that this information is true, accurate, and complete."***

Signed \_\_\_\_\_  
Title \_\_\_\_\_

10. Submit your response to:

Ms. Lisa Trakis (3WP42)  
NPDES Enforcement Branch  
Water Protection Division  
U. S. Environmental Protection Agency  
1650 Arch Street  
Philadelphia, PA 19103

If you have questions regarding this Information Requirement, you may contact Ms. Lisa Trakis of the NPDES Enforcement Branch at (215) 814-5433.

#### **IV. DEFINITIONS**

11. The terms "document" and "documents" shall mean any format that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hard copy, including any form or format of these types. If in computer format or memory, each such document shall be provided in a translated form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include: (a) a copy of each document which is not an exact duplicate of a document which is provided; (b)



each copy which has any writing, notation, or the like on it; c) drafts; (d) attachments to or enclosures with any document; and (e) every other document referred to or incorporated into each document.

12. The term "identify" with respect to a natural person means to provide that person's name, address, telephone number, title, and relationship to the Antrim Township Municipal Authority. The term "identify" with respect to a business entity means to provide that entity's name, address, and relationship to the Antrim Township Municipal Authority, and to provide the name, address, telephone number, and title of an individual who can provide information related to, and on behalf of, the entity.
13. The term "Day" shall mean a calendar day. In computing any period of time under this Information Requirement pursuant to Section 308, where the last day would fall on a Saturday, Sunday, federal or state holiday, the period shall run until the close of the next business day.

#### **V. INFORMATION REQUIRED**

14. AND NOW, this 15<sup>th</sup> day of November, 2016, Antrim Township is hereby directed, pursuant to Section 308 of the Act, 33 U.S.C. § 1318, to provide the following information, no later than 30 days from the effective date of this Information Requirement.
15. Provide a list of Sanitary Sewer Overflows (SSO) which occurred in the collection system owned and/or operated by Antrim Township from January 1, 2011 through the present. Please submit all documents related to each SSO, including but not limited to the:
  - a) Date;
  - b) Duration of discharge;
  - c) Location
  - d) Receiving water body;
  - e) Volume (indicate actual or estimated);
  - f) Cause;
  - g) Analytical results of wastewater discharged;
  - h) Remedial or mitigating actions; and
  - i) Correspondence with PADEP.
16. Provide a list of Bypass events which occurred after the head works of the wastewater treatment plant owned and/or operated by Antrim Township from January 1, 2011

through the present. Please submit all documents related to each bypass event- including but not limited to the:

- a) Date;
  - b) Duration of discharge;
  - c) Location
  - d) Receiving water body;
  - e) Volume (indicate actual or estimated);
  - f) Cause;
  - g) Analytical results of wastewater discharged;
  - h) Remedial or mitigating actions; and
  - i) Correspondence with PADEP.
17. Provide and list of Significant Industrial Users (SIUs) and Categorical Industrial Users (CIUs) discharging to the Antrim Township sewage treatment facility. For each SIU and CIU, provide the current pretreatment discharge permit, self-monitoring reports (including chain of custody forms) from January 1, 2011 through the present.
  18. Provide documents related to compliance monitoring activities conducted by Antrim Township generated from January 1, 2011 through the present, including but not limited to inspection reports for each SIU and CIU and compliance sampling results.
  19. If the Antrim Township Enforcement Response Plan (ERP) has been revised during the past 5 years, provide the previous (ERP(s)) with the effective dates of each.
  20. If the Antrim Township Sewer Use Ordinance (SUO) has been revised during the past 5 years, provide the previous (SUO(s)) with the effective dates of each.
  21. Identify all SIUs and CIUs for which the need for a slug discharge control plans has been evaluated or required and provide copies of all related documents, including but not limited to internal correspondence, and correspondence with SIUs or CIUs.
  22. Provide documents generated from January 1, 2011 to present, that relate to known or suspected instances of pass-through or interference at the Antrim Township wastewater treatment plant including but not limited to internal correspondence and correspondence with SIUs or CIUs.
  23. Provide documents generated from January 1, 2011 through the present related to SIU or CIU industrial wastewater discharge permit violations including documents related to enforcement of industrial wastewater discharge permits, as required by the Enforcement

Response Plan or otherwise.

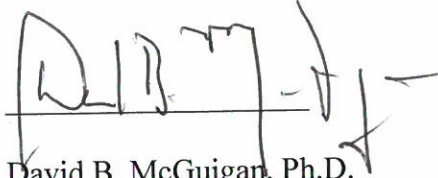
24. Review the Pretreatment Compliance Audit Summary Report (July 15, 2014), Attachment A hereto and provide a response to each of the items set forth in Sections 12.1 and 12.2.

**VI. EFFECTIVE DATE**

25. The effective date of this Information Requirement shall be the date it is received by Antrim Township.

Date:

3/15/16

A handwritten signature in black ink, appearing to read 'D. McGuigan', is written over a horizontal line.

David B. McGuigan, Ph.D.

Associate Director

Office of NPDES Permits & Enforcement

Water Protection Division